

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SERGIO BONILLA, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

ANCESTRY.COM OPERATIONS INC., a
Virginia Corporation; ANCESTRY.COM INC.,
a Delaware Corporation; ANCESTRY.COM
LLC, a Delaware Limited Liability Company;
and DOES 1 through 50, inclusive,

Defendants.

CASE NO. 1:20-cv-07390

Hon. Virginia M. Kendall

JOINT MOTION TO CONTINUE MAY 3, 2022 HEARING

AND TO SET BRIEFING SCHEDULE

Defendants Ancestry.com Operations Inc., Ancestry.com Inc., and Ancestry.com LLC (collectively, “Ancestry”), by and through their undersigned counsel, together with Plaintiff Sergio Bonilla (“Plaintiff”), by and through his undersigned counsel, (collectively, “the parties”) move to set a briefing schedule for Plaintiff’s Motion to Compel (Dkt. No. 75) and Ancestry’s Motion for Protective Order (Dkt. No. 77) and further request that the hearing currently set for May 3, 2022 be continued to May 17, 2022, or a later date convenient for the Court. In support of this motion, the parties state as follows:

1. Pursuant to this Court’s order, a hearing regarding the Motion to Compel, Dkt. No. 75, is set for hearing on May 3, 2022 at 9:15 a.m. Dkt. No. 80.
2. Ancestry’s counsel has a scheduling conflict on May 3, 2022 and thus would be unable to participate in the scheduled hearing.

3. Counsel for Plaintiff and counsel for Ancestry have agreed to the new requested hearing date, and thus, Plaintiff joins this motion.

4. If the parties' request is granted, the hearing would be held on May 17, 2022 or on a date and time thereafter that is convenient for the Court.

5. Previously, Ancestry sought and the Court granted an unopposed motion for a one-week extension of time to file its reply in support of its motion to dismiss the First Amended Complaint. Dkt. Nos. 34, 36. In addition, Ancestry previously sought and the Court granted an unopposed motion to continue an earlier status hearing. Dkt. Nos. 40, 41, 42.

6. This request is sought in good faith and not for any improper purpose or for the purpose of delay.

7. In addition, the parties have conferred and agreed, subject to an order from the Court, that it would be most efficient to set a briefing schedule with respect to Plaintiff's Motion to Compel (Dkt. No. 75) and Ancestry's Motion for a Protective Order (Dkt. No. 77). The parties propose that Ancestry file its response to Plaintiff's Motion to Compel, on May 10, 2022, and that Plaintiff file his response to Ancestry's Motion for a Protective Order on May 10, 2022. The parties have agreed that no replies will be filed.

Wherefore, the parties respectfully request that the Court grant this joint motion to continue the hearing to May 17, 2022, or a later date and time convenient for the Court, and for the briefing schedule stated above.

DATED: April 27, 2022

Respectfully submitted,

/s/ Benjamin R. Osborn

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/s/ Shon Morgan

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Attorneys for Defendants,
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ANCESTRY.COM INC., and
ANCESTRY.COM LLC

CERTIFICATE OF SERVICE

I, the undersigned, certify that on April 27, 2022, I caused a true and correct copy of the foregoing to be filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record via the Court's CM/ECF automated filing system.

By: /s/ Shon Morgan
Shon Morgan